

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

DENNIS R. MOORE and ROBERTA M.  
MOORE

Debtors

Case No. 5-16-04445

Chapter 13

John J. Thomas, B.J.

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**DEBTORS' MOTION TO CONVERT TO CHAPTER 7**

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AND NOW, come the Debtors, by and through their attorney, Brian E. Manning, Esquire, and file the following Motion and in support thereof allege :

1. The instant case was commenced by the filing of a voluntary Petition for Relief under Chapter 13 of the Bankruptcy Code on October 28, 2106.

2. The Debtors desire to Convert their case to a proceeding under Chapter 7 because they have suffered a significant decrease in income which renders them unable to fund a feasible Plan. In fact, if the case were filed today, the Debtors would have qualified to file the case as a Chapter 7 proceeding.

3. The instant case was not previously converted from any other Chapter.

4. The Debtors are eligible to be Debtors under Chapter 7 of the Bankruptcy Code and pursuant to 11 U.S.C. § 1307(a) they have the right to seek conversion to Chapter 7.

5. Notice of the instant Motion is being provided to the Chapter 13 Trustee and the Office of the United States Trustee via ECF.

WHEREFORE, the Debtors respectfully request that this Court enter an order converting the Case to Chapter 7, and that they be granted such other and further relief as the court deems just and appropriate under the circumstances.

Respectfully Submitted  
**Law Offices of Brian E. Manning**  
/s/ Brian E. Manning  
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Dated: April 17, 2018

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IN RE:

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Debtor

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**ORDER GRANTING DEBTORS' MOTION TO CONVERT TO  
CHAPTER 7**

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AND NOW, upon consideration of the Motion of the Debtors to  
Convert to Chapter 7, the Motion is GRANTED and the case is converted to a proceeding  
under Chapter 7.